

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
-v- : **FELONY INFORMATION**
JOHN ERNEST GUERRERO, : 08 Cr. **08 CRIM. 05 15**
Defendant. : **(KnK)**
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COUNT ONE

The United States Attorney charges:

1. From on or about March 24, 2008, up to and including on or about March 29, 2008, in the Southern District of New York and elsewhere, JOHN ERNEST GUERRERO, the defendant, and others known and unknown, unlawfully, wilfully and knowingly did combine, conspire, confederate and agree together and with each other to commit kidnaping.

2. It was a part and an object of the conspiracy that JOHN ERNEST GUERRERO, the defendant, and others known and unknown, would and did seize, confine, kidnap, abduct, carry away, and hold for ransom or reward a person, and did transport that person in interstate commerce and did travel in interstate commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

OVERT ACT

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was

committed in the Southern District of New York and elsewhere:

a. On or about March 28, 2008, JOHN ERNEST GUERRERO, the defendant, stood watch over persons being held in a house in Port Chester, New York.

(Title 18, United States Code, Section 1201(c).)

COUNT TWO

The United States Attorney further charges:

4. From in or about March 4, 2008, up to and including in or about March 29, 2008, in the Southern District of New York and elsewhere, JOHN ERNEST GUERRERO, and others known and unknown, unlawfully, wilfully, and knowingly combined, conspired, confederated and agreed together and with each other to commit an offense against the United States, to wit, to violate Title 8, United States Code, Section 1324(a)(1)(A)(ii).

5. It was a part and an object of the conspiracy that the defendant, JOHN ERNEST GUERRERO, and other known and unknown, unlawfully, wilfully and knowingly, and in knowing and reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, would and did transport and move and attempt to transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of such law, and did so for private financial gain.

OVERT ACT

6. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about March 26, 2008, JOHN ERNEST GUERRERO, the defendant, traveled in a car to a house in Port Chester, New York with at least one illegal alien.

(Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).)


MICHAEL J. GARCIA
United States Attorney